

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:)	
)	Bankr. No. 18-21866GLT
MARVA L. FLORENCE-CURETON,)	
)	Chapter 13
)	
Debtor)	Claim no. 5
)	
)	Document no.
)	
)	Related to doc. no.113

DEBTOR'S DECLARATION IN RESPONSE TO MORTGAGE PAYMENT CHANGE.

Debtor Marva L. Florence-Cureton, by her attorney Stanley A. Kirshenbaum, responds to the Notice of Mortgage Payment Change as follows:

1. Assets Recovery 23 LLC (the "Creditor") filed a Notice of Mortgage Payment Change on December 6, 2021. The Notice contained an increase in the monthly payment to \$852.20 as a result of an increase in the monthly escrow payment.
2. The Debtor consents to the increased payment.
3. The increase in the escrow payment results from the inclusion of real estate taxes in the mortgage payment.
4. The Chapter 13 Plan provided for the payment of delinquent real estate taxes including post-petition taxes.
5. Creditors Aliquippa School District/City and Beaver County Tax Claim Bureau (the "Tax Claimants") have informed the Trustee that their claims have been paid in full. The Trustee has placed payments to the Tax Claimants on reserve

6. An increase in the plan payment is unnecessary because the funds which would have been distributed to the Tax Claimants are sufficient to cover the increased Mortgage Payment.

Dated: December 29, 2021

Respectfully submitted,
/s/Stanley A. Kirshenbaum
Stanley A. Kirshenbaum
Pa. ID No. 43701
P.O. Box 8150
Pittsburgh, PA 15217
(412) 261-5107
SAK@SAKLAW.COM